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Attorneys for Defendant
BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTINE DiBELLA,

Plaintiff,

v.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY;
COMPASS GROUP USA, INC. dba
CHARTWELLS HIGHER EDUCATION,

Defendants.

CASE NO. 4:21-cv-08461-HSG

**STIPULATION AND ORDER
CONTINUING DEADLINE FOR
DEFENDANTS TO RESPOND TO FIRST
AMENDED COMPLAINT**

STIPULATION

Plaintiff CHRISTINE DiBELLA (“Plaintiff”) and Defendants BOARD OF TRUSTEES OF THE CALIFORNIA STATE UNIVERSITY; COMPASS GROUP USA, INC. dba CHARTWELLS HIGHER EDUCATION (collectively, “Defendants”) – Plaintiff and Defendants together the “Parties” – hereby stipulate and request that the deadline for Defendants to file their response to Plaintiff’s First Amended Complaint (“FAC”) be continued for two weeks, from March 25, 2022 to April 8, 2022. This request to continue deadlines is based on the following good cause:

1. On March 4, 2022, Plaintiff filed a 61-page FAC for Preliminary and Permanent Injunctive Relief, Declaratory Relief, and Damages. Dkt. No. 29.
2. The FAC contains numerous new allegations, including class action allegations against The Board of Trustees of the California State University with factual allegations specific to each of its 23 campuses.
3. Due to the complexity and broad scope of the FAC, Defendants require additional time to investigate the new allegations and prepare their responsive pleadings.
4. Pursuant to the above, the Parties jointly stipulate that a new deadline of April 8, 2022 be set for Defendants to respond to the FAC.

IT IS SO STIPULATED.

Date: March 17, 2022

PEIFFER WOLF CAR KANE & CONWAY LLP

/s/ Catherine Cabalo, Esq.
By CATHERINE CABALO, Esq.
Attorneys for Plaintiff
CHRISTINE DiBELLA

Date: March 17, 2022

CLYDE & CO US LLP

/s/ Alison K. Beanum, Esq.
By ALISON K. BEANUM, Esq.
Attorney for Defendant
BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY

Date: March 17, 2022

FISHER & PHILLIPS LLP

/s/ Nathan V. Okelberry, Esq.
By NATHAN V. OKELBERRY, Esq.
Attorney for Defendants
COMPASS GROUP USA, INC

FILER'S ATTESTATION

Pursuant to Local Rule 5-1, I hereby attest that on March 17, 2022, I, Alison Benum, attorney with Clyde & Co US LLP, received the concurrence of Catherine Cabalo, Esq. and Nathan V. Okelberry, Esq. in the filing of this document.

/s/ Alison K. Benum
Alison K. Benum

ORDER

Pursuant to the stipulation of the parties and for good cause shown, the deadline for Defendants to respond to the FAC shall be continued to April 8, 2022.

IT IS SO ORDERED.

Dated: March 17, 2022


Honorable Haywood S. Gilliam, Jr.
U.S. District Court Judge